

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Misc. No. 17-151-LPS
	)	
BOLIVARIAN REPUBLIC OF VENEZUELA,	)	
	)	
Defendant.	)	
	)	

**SPECIAL MASTER’S STATUS REPORT  
REGARDING MARKETING PROCESS DEADLINES**

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*Counsel for Special Master Robert B. Pincus*

Dated: April 16, 2024  
11448452 / 21202.00001

I, Robert B. Pincus, solely in my capacity as special master (the “**Special Master**”) for the United States District Court for the District of Delaware (the “**Court**”) in *Crystallex International Corp. v. Bolivarian Republic of Venezuela* (D. Del. Case. No. 17-151-LPS), hereby submit this status report (“**Status Report**”) to notify the Court and all parties-in-interest of all Bidding Procedures deadlines established as of the date hereof.<sup>1</sup>

### **Statement**

1. On January 8, 2024, I filed the *Special Master’s Status Report Regarding Marketing Process Deadlines* [D.I. 840] (the “**January Status Report**”), outlining applicable Marketing Process deadlines established as of the date thereof. Since the filing of the January Status Report, I have continued to conduct the Marketing Process with the assistance of my Advisors to market the PDVH Shares and have completed a number of the previously established deadlines.

2. Pursuant to the Bidding Procedures, I outline below additional deadlines to supplement the deadlines set forth in the January Status Report. I will supplement with additional or revised interim deadlines throughout the Marketing Process and with sufficient advance notice to the Court and all parties-in-interest:

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<sup>1</sup> Capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* [D.I. 481] (the “**Sale Procedures Order**”).

Key Event	Deadline
Launch Date <sup>2</sup>	Monday, October 23, 2023 (“L”) (Completed)
Step 5 (Writ) Deadline <sup>3</sup>	Friday, January 12, 2024 (Completed)
<u>Round 1</u> : Deadline to Submit Non-Binding Bids	Monday, January 22, 2024 (Completed)
Special Master’s Deadline to File Under Seal a Notice or Recommendation Seeking Final Determination of the Amount of Any Attached Judgment <sup>4</sup>	Tuesday, February 20, 2024 (Completed)
Deadline to File Objections to the Special Master’s Notice or Recommendation Seeking Final Determination of the Amount of Any Attached Judgment	Tuesday, February 27, 2024 (Completed)
Step 7 (Perfected Writ) Deadline <sup>5</sup>	Thursday, April 11, 2024 (Completed)
<u>Round 2</u> : Deadline to Submit Final Binding Bids	Tuesday, June 11, 2024

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<sup>2</sup> The Court established the Launch Date pursuant to the *Memorandum Order*, dated July 17, 2023 [D.I. 643].

<sup>3</sup> The Court established the Step 5 (Writ) Deadline pursuant to the *Memorandum Order*, dated October 11, 2023 [D.I. 738].

<sup>4</sup> The original deadline for the Special Master to file his notice or recommendation was thirty (30) days prior to the designation of a Stalking Horse Bidder, which was equivalent to 120 days after the Launch Date. *See* Sale Procedures Order ¶ 31. The Special Master is not seeking a Stalking Horse Bidder at this time, but believes the same deadline relative to the Launch Date is appropriate.

<sup>5</sup> The Court established the Step 7 (Perfected Writ) Deadline pursuant to the *Memorandum Order*, dated October 11, 2023 [D.I. 738].

Key Event	Deadline
Deadline to File Notice of Successful Bid <sup>6</sup>	As soon as reasonably practicable following selection of a Successful Bid
Deadline to File Objections to Sale Transaction	To be determined
Deadline for Parties to Reply to Objections to Sale Transaction	To be determined
Tentative Sale Hearing <sup>7</sup>	Monday, July 15, 2024 (L + 266 days)

3. While, as of the date hereof, I have elected to pursue the two-step bidding process reflected above, in the future I may elect to modify my strategy for the Marketing Process in response to changing circumstances, feedback from parties-in-interest, or as otherwise advisable in my judgment in accordance with applicable law. I may request the Court change the date of the tentative Sale Hearing. Any modifications may result in changes to the deadlines set forth in this Status Report. In such an event, my Advisors and I will provide sufficient advance notice to the Court and all parties-in-interest.

Respectfully Yours,

/s/ Robert B. Pincus

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

cc: Counsel of Record (via CM/ECF and E-Mail)

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<sup>6</sup> See Sale Procedures Order ¶ 12.

<sup>7</sup> The Court established the date of the tentative Sale Hearing pursuant to the *Memorandum Order*, dated July 17, 2023 [D.I. 643].